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June 5, 2015

**BY ECF**

The Honorable John Gleeson  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Hasbajrami*,  
11 Cr. 623 (JG)

Dear Judge Gleeson:

This letter is in regard to the above-entitled case, in which I, along with Steven Zissou, Esq., and Michael Bachrach, Esq., represent defendant Agon Hasbajrami, and relates to the defense's motion, pursuant to *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 526 U.S. 59 (1993), to preclude the testimony of the government's proposed expert, Evan Kohlmann.

Mr. Kohlmann's expert report has not yet been produced. As a result, it is not possible to complete the motion until that report – of course an essential element of any *Daubert* motion – is provided. As a result, it is respectfully requested that the defense be permitted to write the Court when the report is produced and propose a firm schedule for the motion.

Respectfully Submitted,



Joshua L. Dratel

JLD/

cc: Seth D. DuCharme  
Saritha Komatireddy  
Assistant United States Attorneys